

1 Kate Mueting, DC Bar No. 988177 (*pro hac vice*)
2 Dacey Romberg, DC Bar No. 90003767 (*pro hac vice*)
3 Samone Ijoma, MD Bar No. 2012170086 (*pro hac vice*)

SANFORD HEISLER SHARP, LLP

4 700 Pennsylvania Avenue SE, Suite 300
Washington, DC 20003

5 Telephone: (202) 499-5206
6 kmueting@sanfordheisler.com
dromberg@sanfordheisler.com
sijoma@sanfordheisler.com

7 Charles Field, SBN 189817

SANFORD HEISLER SHARP, LLP

8 7911 Herschel Avenue, Suite 300
9 La Jolla, CA 92037

10 Telephone: (619) 577-4252
cfield@sanfordheisler.com

11 Kristi Stahnke McGregor, GA Bar No. 674012 (*pro hac vice*)

SANFORD HEISLER SHARP, LLP

12 611 Commerce Street, Suite 3100
13 Nashville, TN 37203

14 Telephone: (615) 434-7008
kmcgregor@sanfordheisler.com

15 Christopher Owens, MD Bar No. 220280004 (*pro hac vice*)

SANFORD HEISLER SHARP, LLP

16 111 S. Calvert Street, Suite 1950
17 Baltimore, Maryland 21202

18 Telephone: (410) 834-7422
cowens@sanfordheisler.com

19 *Attorneys for Plaintiffs*
20 *and the Potential Class*

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NORTHERN CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 COURTNEY MCMILLIAN and RONALD
12 COOPER, on behalf of themselves and all others
similarly situated,

13 Plaintiffs,

14 v.
15

16 X CORP., f/k/a/ TWITTER, INC.,
X HOLDINGS, ELON MUSK, Does,

17 Defendants.
18

Case No. 3:23-cv-03461-TLT

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Hon. Trina L. Thompson

DATE: April 23, 2024

TIME: 2:00 pm PT

LOCATION: Courtroom 09

19
20 Pursuant to Civil Local Rules 7–11 and 79–5(f), Plaintiffs respectfully submit this
21 Administrative Motion to Consider Whether Another Party's Material Should be Sealed in
22 connection with Plaintiffs' Opposition to Defendants' Motion to Dismiss ("Opposition"), attached
23 here as "Exhibit A".
24

25 Plaintiffs file this administrative motion because Plaintiffs' Opposition includes details and
26 quotations from the Twitter Severance Matrix, attached as Appendix 1 to the Complaint, Dkt. No.
27 1–1, and Defendants have asserted that the Appendix is privileged. As Plaintiffs explained in their
28

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Motion to Remove Appendix 1 from the Public Docket and File It Provisionally Under Seal, Dkt. No. 4, Plaintiffs do not understand that the Appendix is subject to the protections of attorney-client privilege or the work-product doctrine or that the Appendix should be filed under seal. Pursuant to Rule 79–5(f)(4), Plaintiffs anticipate filing a response to Defendants’ statement in support of sealing.

In the meantime, Plaintiffs have provisionally filed the following information under seal:

Docket No. Public / (Sealed)	Document	Portion(s) Sought to be Sealed	Reasons for Sealing
Dkt. No. 45 / (Dkt. No. 46–2)	Plaintiffs’ Opposition to Defendants’ Motion to Dismiss	References to the Twitter Severance Matrix, Dkt. No. 1–1	Defendants’ Designation

DATED: February 9, 2024

Respectfully submitted,

Sanford Heisler Sharp, LLP

By: Kate Mueting
 Kate Mueting, DC Bar No. 988177
SANFORD HEISLER SHARP, LLP
 700 Pennsylvania Ave SE, Suite 300
 Washington, DC 20003
 Telephone: (202) 499-5206
 kmueting@sanfordheisler.com

*Attorney for Plaintiffs
and the Potential Class*

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CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a copy of this filing to all counsel of record.

DATED: February 9, 2024



Kate Muetting, DC Bar No. 988177
SANFORD HEISLER SHARP, LLP
700 Pennsylvania Ave SE, Suite 300
Washington, DC 20003
Telephone: (202) 499-5206
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*Attorney for Plaintiffs
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